

CLERK US DISTRICT COURT  
NORTHERN DIST. OF TX  
FILEDIN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
SAN ANGELO DIVISION

2010 APR 22 PM 4:51

DEPUTY CLERK

DSRSTUART GOODNER and  
LISA GOODNER, Individually and as  
Legal Heirs of the ESTATE OF SARAH  
GOODNER, Deceased,

Plaintiffs,

v.

HYUNDAI MOTOR COMPANY, LTD.,

Defendant.

Civil Action No. 6:08-CV-078-C  
ECF**DEFENDANT HYUNDAI MOTOR COMPANY'S TRIAL EXHIBIT LIST**

Exhibit No.	Description	Offered	Admitted
1.	Mark Leonard curriculum vitae	4/20/10	✓
2.	Accident Report	4/20/10	✓
3.	Police Scene Photographs 3.4 3.14 (offered 4/21/10-admitted) 3.38 3.53	4/20/10 4/20/10 4/20/10	✓ ✓ ✓
4.	Scene Diagram – scale with evidence	4/20/10	✓
5.	Scene Diagram - with police identificaton	4/20/10	✓
6.	Scene Diagram - with scaled vehicle	4/20/10	✓
7.	Scene Diagram - with distances	4/20/10	✓
8.	Scene Diagram - with roll distances	4/20/10	✓
9.	SAE Paper 890857- Reconstruction of Rollover Collisions, Orlowski and Moffatt		
10.	SAE Paper 960647-A Primer on the Reconstruction and Presentation of Rollover Accidents, Martinez and Schlueter		
11.	SAE Paper 2008-01-0156 – Rollover Crash Tests on Dirt: An Examination of Rollover Dynamics, Luepke, Carger, Germane		

Case No. 6:08-CV-078-C - Stuart Goodner, et al. Vs Hyundai Motor Company, Ltd., et al. - Exhibit List - *continued*

Exhibit No.	Description	Offered	Admitted
12.	SAE Paper 2008-01-0172-Rollover Dynamics: An Exploration of the Fundamentals, Carter, Luepke, Germane		
13.	M. Leonard Calculations		
14.	VSI Scene Photographs (8/7/08) 14.4	4/20/10	√
15.	VSI Vehicle Photographs (08/21/08) 15.3            15.35            15.152 15.6            15.36 15.7            15.50 15.8            15.51 15.41          15.57 15.46          15.151	4/20/10	√ all admitted
16.	VSI Vehicle Photographs (06/06/09) 16.1 16.3 16.4 16.19	4/20/10	√ all admitted
17.	Mike Klima - curriculum vitae	4/20/10	√
18.	Accident Seat Belt Assemblies		
19.	Exemplar Seat Belt Assemblies		
20.	FMVSS Code of Federal Regulations Part 571.207		
21.	FMVSS Code of Federal Regulations Part 571.208		
22.	FMVSS Code of Federal Regulations Part 571.209		
23.	FMVSS Code of Federal Regulations Part 571.210		
24.	FMVSS Code of Federal Regulations Part 571.216		
25.	Model exemplar vehicle		
26.	2005 Hyundai Tucson Owner's Manual, Handbook, and Supplement	4/19/10	√
27.	Hyundai Airbag Safety brochure, hangtag, and warnings	4/20/10	√
28.	Definition of "minimum performance standards" within the meaning of the Federal Motor Vehicle Safety Standards by James B. Gregory, Administrator, National Highway Traffic Safety Administration. Published at Docket No. 75-7; Notice 02; Federal Register, Vol. 41, No. 11, p. 2392, 1/16/76.		

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Exhibit No.	Description	Offered	Admitted
29.	Inspection Notes for Inspection of October 16, 2008		
30.	Inspection Photographs of October 16, 2008	4/19/10	√
31.	Inspection Photographs for Surrogate Analysis of May 8, 2009 31.14            31.29            31.37 31.48            31.35            3.41 31.15            31.33 31.26            31.30	4/20/10	√ all admitted
32.	Inspection Photographs for Ford Vehicles with Surrogate of March 12, 2010 32.18 32.16 32.19 32.38	4/20/10	√ all admitted
33.	Chart: Vehicle Miles Traveled by Year		
34.	Chart: Motor Vehicle Fatalities by Year		
35.	Chart: Motor Vehicle Fatality Rate by Year		
36.	Chart: Driver Seat Belt Usage Rates		
37.	Chart: Cumulative Roll Count Distributions in Single Vehicle Rollover Accidents	4/19/10	√
38.	Chart: Current Status of 2000 Model Year Vehicles with Front Integrated Seats (and back up materials)		
39.	Chart: Risk of Total Ejection by Restraint Use (NASS GES 1995-2004 Ejection Analysis); and backup materials (methods)		
40.	Chart: Vehicle Models Introduced in 2005 - Presence of SIR (and backup materials)		
41.	Excerpt from Safercar.gov entitled, "Rollover – Minimize Risk and Injury"		
42.	Bready, J., Nordhagen, R., Kent, R. and Jakstis, M., "Characteristics of Seat Belt Restraint System Markings", Paper No. 2000-01-1317, Society of Automotive Engineers, 2000		
43.	Bready, J., Nordhagen, R. and Kent, R., "Seat Belt Survey: Identification and Assessment of Noncollision Markings", Paper No. 1999-01-0441, Society of Automotive Engineers, 1999		

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Exhibit No.	Description	Offered	Admitted
44.	Heydinger, G.J., Uhlenhake, G. D., Guenther, D. A., Dunn, A. L., "Comparison of Collision and Noncollision Marks on Vehicle Restraint Systems", Paper No. 2008-01-0160, Society of Automotive Engineers, 2008		
45.	Moffatt, C.A., Moffatt, E.A., and Weiman, T.R., "Diagnosis of Seat Belt Usage in Accidents", Paper No. 840396, Society of Automotive Engineers. February 1984		
46.	Padmanaban, J. and Burnett, R., "Seat Integrated and Conventional Restraints: A Study of Crash Injury/Fatality Rates in Rollovers", 52nd Annual AAAM, 2008	4/20/10	demonstrative
47.	Thomson, R., Romilly, D., Navin, F., Macnabb, M., "Dynamic Requirements of Automotive Seatbacks", Paper No. 930349, Society of Automotive Engineers, 1993		
48.	Klima, M., Toomey, D., Weber, M., "Seat Belt Retractor Performance Evaluation in Rollover Crashes", Paper No. 2005-01-1702, Society of Automotive Engineers, 2005		
49.	Toomey, D., Klima, M., Cooper, E., "Evaluation of Seat Belt Assembly Physical Evidence in Properly Functioning and Intentionally Disabled Retractor Demonstrations", Paper No. 2009-01-1245, Society of Automotive Engineers, 2009		
50.	General Motors Press Release and Web Content Literature regarding ABTS		
51.	Exponent Dolly Rollover Test and Video - PH09107 (Viggiano v Ford, 2000 Lincoln Navigator)		
52.	Survey Report - 2004-DRE-101NS - Seat Back Angle Survey	4/20/10	√
53.	Test Report and Videos - 2006-DRE-102PT - Demonstration of Seatbelt Retractor Performance in a Rollover Environment		
54.	Test Report and Videos - 2007-DRE-102PT - Demonstration of Seatbelt Retractor Performance in a Rollover Environment		
55.	Test Report and Videos - 2007-DRE-111PT - Demonstration of Seatbelt Retractor Performance in a Rollover Environment		
56.	Allan Dorris – curriculum vitae	04/21/10	√

Case No. 6:08-CV-078-C - Stuart Goodner, et al. Vs Hyundai Motor Company, Ltd., et al. - Exhibit List - *continued*

Exhibit No.	Description	Offered	Admitted
57.	Effectiveness of Warning Labels and Signs: An Update on Compliance Research, T. Ayers, et al		
58.	Human Factors in the Design of Effective Product Warnings, by Alan Dorris		
59.	Judgments of Risk Associated with Riding with a Reclined Seat in an Automobile, T. Rhoades, et al	04/21/10	demonstrative
60.	Mandatory Air Bag Warnings: A Human Factors Analysis of their Development, by Alan and Nathan Dorris	04/21/10	demonstrative
61.	On the Reading of Product Owner's Manuals: Perceptions and Product Complexity, Mehlenbacher, et al		
62.	Potential Problems Associates with Overusing Warnings, Frantz, et al		
63.	Product Information Presentation, User Behavior and Safety, McCarthy, et al		
64.	Consumer Product Warnings: Review and Analysis of Effectiveness Research, DeJoy, et al		
65.	Supporting the Warning Designer: An Automotive Case Study, Alan and Nathan Dorris		
66.	Warning Research: An Integrative Perspective, Rogers, et al		
67.	2005 Taurus Owner's Guide (selected pages)	04/21/10	demonstrative
68.	2005 Owner's Manual Accord Sedan (selected pages)	04/21/10	demonstrative
69.	2005 911 Carrera Owner's Manual (selected pages)	04/21/10	demonstrative
70.	2005 Passat Owner's Guide (selected pages)	04/21/10	demonstrative
71.	Survey of 2003 Model Year Vehicles: Seat Recline Warnings, Erwin	04/21/10	√
72.	Notice of Equipment Compliance re: "DOT 748, AS-1, M-52", test report date: 10/25/04; notification #040780, 00974857, Confidential		
73.	Notice of Equipment Compliance re: "DOT 748, AS-1, M-53", test report date: 10/25/04; notification #040781, Confidential, 00974858		
74.	Test Video DVD, Confidential, 01000937		

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Exhibit No.	Description	Offered	Admitted
75.	Test Video DVD, Confidential, 01000938		
76.	Test Video DVD, Confidential, 01000939		
77.	Test Video DVD, Confidential, 01000940		
78.	Test Video DVD, Confidential, 01000941		
79.	Test Video DVD, Confidential, 01000942		
80.	Test Video DVD, Confidential, 01000943		
81.	Test Video DVD, Confidential, 01000944		
82.	Test Video DVD, Confidential, 01000945		
83.	Test Video DVD, Confidential, 01000946		
84.	Test Video DVD, Confidential, 01000947		
85.	Engineering Change Order #S2E3013, Confidential, 02000811-812		
86.	Engineering Change Order #S2E4020, Confidential, 02000813-818		
87.	Engineering Change Order #S2E4025, Confidential, 02000819-821		
88.	Engineering Change Order #N2E31024, Confidential, 02001261-1262		
89.	Engineering Change Order #H2E40005, Confidential, 02001262-1265		
90.	Engineering Change Order #H2E40167, Confidential, 02001266-1268		
91.	Engineering Change Order #H2E40416, Confidential, 02001269-1270		
92.	Engineering Change Order #H2E40608, Confidential, 02001271-1273		
93.	Engineering Change Order #H2E40767, Confidential, 02001274-1275		
94.	SGS Test Report No. 62264-04 re: M/N TK-AF6-Z029 installed in the front left hand seats of the Hyundai JM 2004 Model; 4/16/04, Confidential, 02000822-838		

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Exhibit No.	Description	Offered	Admitted
95.	SGS Test Report No. 62271-04 re: M/N TK-AF6-Z030 installed in the front right hand seats of the Hyundai JM 2004 Model; 4/16/04, Confidential, 02000839-855		
96.	SGS Test Report No. 95879-04 re: Automotive Seat Belt Assemblies Model No. TK-ABO-ZO04 which was previously tested under report No. 179711-030 on 11/12/03; 5/21/04, Confidential, 02000856-863		
97.	SGS Test Report No. 179711-03 re: M/N TK-ABO-ZO04 installed in the rear center seat of the Hyundai JM 2004 Model; 11/12/03, Confidential, 02000864-880		
98.	SGS Test Report No. 81005-04 re: Automotive Seat Belt Assemblies Model No. TK-ABO-ZO03- Addendum to SGS U.S. Testing Company Inc. Report no. 179715-030 11/12/03; 4/12/04, Confidential, 02000881-888		
99.	SGS Test Report No. 179715-03 re: M/N TK-ABO-ZO03 installed in the rear left seat of the Hyundai JM 2004 Model; 11/12/03, Confidential, 02000889-905		
100.	SGS Test Report No. 81008-04 re: Automotive Seat Belt Assemblies Model No. TK-ABO-ZO05- Addendum to SGS U.S. Testing Company Inc. Report no. 179728-03 11/3/03; 4/12/04, Confidential, 02000906-913		
101.	SGS Test Report No. 179728-03 re: M/N TK-ABO-ZO05 installed in the rear right seat of the Hyundai JM 2004 Model; 11/3/03, Confidential, 02000914-930		
102.	FMVSS 207 & ADR 3/02 Vehicle Compliance Testing of Seat Anchorages Hyundai JM 2004 MY (Report No. L4-JM-020; Test Date: 12/26/03-1/16/04; Report Date: 2/18/04), Confidential, 02001276-1324		
103.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 20 mph Frontal Impact Test; Report No. L4-JM-060; Test Date: 5/15/04; Report Date: 5/22/04), Confidential, 02001325-1387		
104.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 25 mph Frontal Offset Impact Test (Report No. L4-JM-061; Test Date: 4/9/04; Report Date: 4/16/04), Confidential, 02001388-1452		
105.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 30 mph Frontal Impact Test (Report No. L4-JM-062; Test Date: 7/17/04; Report Date: 7/24/04), Confidential, 02001453-1517		



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Exhibit No.	Description	Offered	Admitted
106.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 20 mph Frontal Impact Test (Report No. L4-JM-063; Test Date: 4/11/04; Report Date: 4/18/04), Confidential, 02001518-1579		
107.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 20 mph 30 degrees Driver Side Oblique Impact Test (Report No. L4-JM-064; Test Date: 5/17/04; Report Date: 5/24/04), Confidential, 02001580-1641		
108.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 20 mph 30 degree Passenger Side Oblique Impact Test (Report No. L4-JM-065; Test Date: 5/14/04; Report Date: 5/21/04), Confidential, 0201641-1704		
109.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 20 mph 30 degree Driver Side Oblique Impact Test (Report No. L4-JM-066; Test Date: 4/19/04; Report Date: 4/26/04), Confidential, 02001705-1767		
110.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 30 mph Frontal Impact Test (Report No. L4-JM-068; Test Date: 5/13/04; Report Date: 5/20/04), Confidential, 02001768-1832		
111.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 25 mph Frontal Impact Test (Report No. L4-JM-082; Test Date: 5/19/04; Report Date: 5/26/04), Confidential, 02001833-1894		
112.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 25 mph Frontal Impact Test (Report No. L4-JM-083; Test Date: 5/13/04; Report Date: 5/20/04), Confidential, 02001895-1957		
113.	FMVSS 208 Vehicle Compliance Testing of Seat Belt Installation Hyundai JM 2004 MY(Report No. L4-JM-085; Test Date: 5/4/04-5/6/04; Report Date: 5/7/04), Confidential, 02001998-2007		
114.	FMVSS 210 Vehicle Compliance Testing of Seat Belt Assembly Anchorages Hyundai JM 2004 MY(Report No. L4-JM-086; Test Date: 5/11/04-5/12/04; Report Date: 5/13/04), Confidential, 02002008-2041		



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Exhibit No.	Description	Offered	Admitted
115.	F(C)MVSS 216 & GS 39 Vehicle Compliance Testing of Roof Crush Resistance Hyundai JM 2004 MY (Report No. L4-JM-087; Test Date: 3/4/03; Report Date: 4/7/03), Confidential, 02002042-2061		
116.	FMVSS 208 "Occupant Crash Protection" Vehicle Compliance Testing of 25 mph 30 Passenger Side Oblique Impact Test (Report No. L4-JM-067; Test Date: 4/27/04; Report Date: 5/4/04), Confidential, 02002790-2852		
117.	JM Int/ext. Package L/Out- top view (large drawing), Confidential, 05180181		
118.	JM Int/ext. Package L/Out – side view (large drawing), Confidential, 05180182		
119.	JM Int/ext. Package L/Out – rear view (large drawing), Confidential, 05180183		
120.	Seat Assy-Frt. Dr's (large drawing), Confidential, 05180184		
121.	Seat Assy-Frt. Dr's (large drawing), Confidential, 05180185		
122.	Seat Assy-Frt. Dr's (large drawing), Confidential, 05180186		
123.	Seat Assy-Frt. Dr's (large drawing), Confidential, 05180187		
124.	Seat Assy-Frt. Dr's (large drawing), Confidential, 05180188		
125.	Seat Belt Assy-Fr P/T 3PT, LH (large drawing), Confidential, 05180189		
126.	Application for Compliance Notification; Model name/number of device DOT-748 AS-2 M-3.52; Report No. 00440; Report Date: Oct. 19, 2004, Confidential, 02013973		
127.	Test Report (China National Motor Vehicle Safety Glazing Materials Testing Laboratory) Order No. 2-206; Report No. 00440; Date: Oct. 19, 2004, Confidential, 02013974-02013979		
128.	Notice of Equipment Compliance; Notification No. 040785; Test Report Date: Oct. 19, 2004, Confidential, 02013938		

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Exhibit No.	Description	Offered	Admitted
129.	Application for Compliance Notification; Model Name/number of device DOT-748 AS-2 M-3.53; Report No. 00441; Report Date: Oct. 19, 2004, Confidential, 02013980-02013986		
130.	Notice of Equipment Compliance; Notification No. 040786; Test Report Date: Oct. 19, 2004, Confidential, 02013939		
131.	Application for Compliance Notification; Model name/number of device DOT-748 AS-2 M-32; Report No. 00438; Report Date: Oct. 19, 2004, Confidential, 02013966-02013972		
132.	Notice of Equipment Compliance; Notification No. 040783; Test Report Date: Oct. 19, 2004, Confidential, 02013940		
133.	Application for Compliance Notification; Model name/number of device DOT-748 AS-2 M-52; Report No. 00446; Report date: Oct.19, 2004, Confidential, 02013987-02013993		
134.	Notice of Equipment Compliance; Notification No. 040791; Test Report Date: Oct. 19, 2004, Confidential, 02013941		
135.	Application for Compliance Notification; Model name/number of device DOT-748 AS-2 M-53; Report No. 00447; Report date: Oct. 19, 2004, Confidential, 02013994-02014000		
136.	Notice of Equipment Compliance; Notification No.040792; Test Report Date: Oct. 19, 2004, Confidential, 02013942		
137.	Application for Compliance Notification; Model Name/number of device DOT-748 AS-3 M-55; Report No. 00450; Oct. 19, 2004, Confidential, 02014001-02014006		
138.	Notice of Equipment Compliance; Notification No. 040795; Test Report Date: Oct. 19, 2004, Confidential, 02013943		
139.	Dr. Robert Banks – Curriculum Vitae		
140.	Injury Diagram – Sarah Goodner		
141.	Injury Diagram – Rebekah Goodner		

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Exhibit No.	Description	Offered	Admitted
142.	Occupant movement in rollovers (beachball forms)		
143.	Occupant movement in rollovers (figures)		
144.	Occupant kinematics charts		
145.	Seatbelt-to-seat geometry differences between upright and reclined seatbacks		
146.	Driver's manual warning about traveling with seat back in reclined position		
147.	Dr. Robert Banks vehicle inspection photographs		
148.	Head Injured Patients Who "Talk and Die", D. Davis et al		
149.	Occupant Ejection Trajectories in Rollover Crashes: Full Scale Testing and Real World Cases, Funk et al		
150.	Response of Reclined Post Mortem Human Subjects to Frontal Impact, Wiechel et al.		
151.	Rollover Crash Tests – The Influence of Roof Strength on Injury Mechanics		
152.	Safety Study – Performance of Lap/Shoulder Belts in 167 Motor Vehicle Crashes		
153.	Seat Belt and Car Seat in a Reclined Position: A Dangerous Combination, Rehm, et al		
154.	The Effect of Reclined Seats on Mortality in Motor Vehicle Collisions, Dissanaik, et al		
155.	Exponent Dolly Rollover Test, 1995 Explorer, TEC 10630, October 24, 2006, test, photographs and video		
156.	Exponent Dolly Rollover Test, 2000 Explore, TEC 0805511, September 26, 2008, test report, photographs and video		
157.	Accident reconstruction diagram – Banks		
158.	USAA records and photographs (deposition by written question)		
159.	Shannon Medical Center – Sarah Goodner		
160.	Huffines Hyundai (deposition by written question)		
161.	Texas Department of Public Safety records (deposition by written question)		

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<b>Exhibit No.</b>	<b>Description</b>	<b>Offered</b>	<b>Admitted</b>
162.	Safecar.gov website information on 2005 Hyundai Tucson	4/19/10	not admitted
163.	FMVSS208 Vehicle Compliance Testing of Seat Belt Installation Hyundai JM 2004MY, Report No. L4-JM-085, May 4-6, 2004, 02001958-1997.		
164	Expert's handwritten chart on easel	04/21/10	√
165	19999 Owner's Manual for Ford Explorer	04/21/10	demonstrative